

**TAMAR GRUENBAUM; and
TAMAR GRUENBAUM DDS, LLC,
doing business as RIDGEWOOD VALLEY
PEDIATRIC DENTISTRY,**

Plaintiffs,

~ versus ~

**SHANALEE ACKERMAN; and
ACKERMAN PRACTICE MANAGEMENT,
LLC**

,

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY**

Docket No. BER-L -003841-2021

CERTIFICATION

STATE OF)
) ss.
COUNTY OF)

A. INTRODUCTION

1. My name is Shanalee Ackerman, and I am a natural person above the age of 18 and named in this action as a Defendant.

2. In addition to being the named individual Defendant in this action, I am also the Registered Agent of the LLC that is also named as a Defendant.

3. I Certify that the following statements are true. I am aware that if any of the following statements made by me are willfully false, I am subject to punishment.

4. I respectfully submit this Affidavit in Opposition to the Plaintiffs' Motion for Entry of Default.



5. To the extent appropriate and if the Court so orders, I am ready to personally testify at a Proof Hearing about the circumstances of this case and why the Motion to Enter a Default should not be entered.

B. NO DEFENDANT HAS BEEN SERVED

6. Ackerman Practice Management, LLC is a limited liability company organized and existing under Florida law. It has no offices in New Jersey or New York.

7. 1775 York Avenue, Suite #32A is not the address of the Registered Agent as alleged in the Affidavit of Service.

8. The most recent Annual Report for Ackerman Practice Management, LLC shows that the address of the LLC is at Florida. A true copy of the June 2, 2021 filing with the Florida Department of State is annexed as Exhibit A.

9. I am informed that the Plaintiffs alleged they served and mailed Ackerman Practice Management, LLC, at 1775 York Avenue, Suite #32A, New York, New York.

10. 1775 York Avenue, Suite #32A, New York, NY is not my address

11. Annexed as Exhibit B is a copy of just one example showing that my address – this is a redacted copy of a current utility bill. If so requested, I can provide the Court whatever supplementary evidence it may need at the Hearing on Proof about this issue. Simply put: I don't live at 1775 York Avenue, Suite #32A, New York New York and did not leave at that address when I was supposedly served and sent mail.



12. With the entry of an appropriate Order of Confidentiality, I can share with the Court a copy of my lease confirming that I do not live at the supposed address where service and mailing was sent.

13. In addition, I am informed that the papers submitted by the Plaintiffs include a return receipt dated June 24, 2021.

14. I did not sign that return receipt.

15. I was not in New York City on June 24, 2021.

16. Annexed as Exhibit C is an AirBNB confirmation of a trip to New England that I took which included June 24, 2021. With the entry of an appropriate Order of Confidentiality, I can share with the Court my credit card records showing purchases made in person in New England on June 23 – June 27, 2021.

17. Simply put I did not sign the return receipts.

18. It would appear, although admittedly this is speculation based on information and belief, that as a courtesy, the doorman at the 1775 building may have without authority taken on herself or himself to sign the return receipts.

19. But for the avoidance of doubt: the mail and deliveries were not sent to my address.

20. I did not sign the return receipts.

21. And at no time did I authorize the building doorman to accept service on my behalf or on behalf of Ackerman Practice Management LLC.

22. At no time did I authorize the building doorman to sign a return receipt on behalf of myself or on behalf of Ackerman Practice Management LLC.



C. CONTEXT OF THIS LAWSUIT

23. In addition, I understood that this case here in New Jersey, arises from the proceedings in an ongoing matrimonial action between the Plaintiff and her (ex-)husband in New York.

24. I had heard rumors about the lawsuit but understood that any action – including any supposed lawsuit against me and my LLC – was Stayed while the matrimonial action was pending with an eye to resolving this out of court or the case being mooted by the outcome of the matrimonial action.

25. I am not a lawyer and had no independent basis for me to find out how this case was proceeding and until I obtained New Jersey counsel, I was unaware that I was supposedly in “Default” and had no idea that the Plaintiffs claim to have served me with the papers.

26. I hope the Court will understand that it has always been my intention that if a lawsuit was filed against me, I would defend it in good faith.

27. If the service was valid, then my failure to respond earlier was based on my understanding that I was not served and that separately, the case was Stayed pending the outcome of the matrimonial action.

28. In addition, the allegations in the Complaint about my alleged wrongdoing are entirely untrue and I deny them completely.

29. Thank you for your consideration of this Certification and with my lawyer’s Memorandum of Law in Opposition to the Motion for Entry of a Default, I respectfully ask that the Court not enter a default and provide me the opportunity to respond to the Complaint.




30. I remain available if the Court would want further information in any Proof Hearing on the issues raised in this Motion.

DATED: **SEPTEMBER 1, 2021**

RESPECTFULLY SUBMITTED,

By: 
SHANALEE ACKERMAN

Signed and sworn before me this
1st day of September, 2021



CHIRAG PATEL
ELECTRONIC NOTARY PUBLIC
COMMONWEALTH OF VIRGINIA
REGISTRATION # 7679556
COMMISSION EXP JUNE 30, 2024

Notary Stamp Placed at 2021/09/01 22:30:29 EST

az0cs

Document Notarized using a Live Audio-Video Connection



2021 FLORIDA LIMITED LIABILITY COMPANY REINSTATEMENT

FILED

DOCUMENT# L16000110617

Jun 02, 2021

Entity Name: ACKERMAN PRACTICE MANAGEMENT, LLC

Secretary of State
3423877675CR

Current Principal Place of Business:

13867 JEREMIAH ROAD
JACKSONVILLE, FL 32224

Current Mailing Address:

13867 JEREMIAH ROAD
JACKSONVILLE, FL 32224 US

FEI Number: 81-3364623

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

ACKERMAN, SHANALEE
13867 JEREMIAH ROAD
JACKSONVILLE, FL 32224 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: SHANALEE ACKERMAN

06/02/2021

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title AMBR
Name ACKERMAN, SHANALEE
Address 104 WEST OAK HIGHWAY
City-State-Zip: WESTMINSTER FL 29697

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: SHANALEE ACKERMAN

MEMBER

06/02/2021

Electronic Signature of Signing Authorized Person(s) Detail

Date



August 29, 2021
Account Number:
Security Code:
Service At:

1775 YORK AV APT 5F
NEW YORK NY 10128-6906

Auto Pay Notice

NEWS AND INFORMATION

Have questions about your bill?

Visit us at [Spectrum.net/billing](https://spectrum.net/billing)
Or, call us at 1-855-70-SPECTRUM (1-855-707-7328)

Summary

Service from 08/29/21 through 09/28/21
details on following pages

Previous Balance	
Payments Received -Thank You!	
Remaining Balance	\$0.00
Spectrum TV@™	
Spectrum Internet™	
Other Charges	
Taxes, Fees and Charges	
Current Charges	
YOUR AUTO PAY WILL BE PROCESSED 09/16/21	
Total Due by Auto Pay	

Enrolled in Auto Pay: Your Auto Pay payment will be deducted on your due date.

Make your next move! We'll get your Spectrum services set up in your new home so you can get settled in faster. Manage your account with the My Spectrum App and learn about self-install options to handle your move on your terms. **Call 1-844-599-7767 or visit [Spectrum.net/easymove](https://spectrum.net/easymove).**

Are you a small business owner? Find out how Spectrum Business can help your business cut their bill in half. **Call 844-308-1622 today!**

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Thank you for choosing Spectrum.

We appreciate your prompt payment and value you as a customer.

Auto Pay Thank you for signing up for auto pay. Please note your payment may be drafted and posted to your Spectrum account the day after your transaction is scheduled to be processed by your bank.



4145 S. FALKENBURG RD RIVERVIEW FL 33578-8652

SHANALEE ACKERNAN
1775 YORK AVE APT 5F
NEW YORK NY 10128-6906

August 29, 2021

SHANALEE ACKERNAN

Account Number:

Service At:

1775 YORK AV APT 5F
NEW YORK NY 10128-6906

Total Due by Auto Pay

SPECTRUM
PO BOX 7186
PASADENA CA 91109-7186



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Holland Inn of Bar Harbor <communications@resnexus.com>
Date: April 27, 2021 at 11:22:34 AM EDT
To: erin.doherty0@gmail.com
Subject: Holland Inn of Bar Harbor - Confirmation: #85044
Reply-To: Holland Inn of Bar Harbor <info@hollandinn.com>

Tuesday, Apr 27, 2021

Dear Erin,

This letter is to confirm the reservation you have made at the Holland Inn. Here are directions check in procedures. If you have any questions at all, please call or send an email. Also if poss

FROM BANGOR, MAINE : [approximately 45 miles]

It takes about 45 minutes to an hour to get here, October through mid June or 1-1 1/2 hours [at From Interstate 95 North or South, get off at Exit 182A in Bangor, which is Interstate 395 East. Route 3 to Bar Harbor. There are a lot of signs.

At the head of the island, there will be a light and a fork in the road. Go left, following Route 3. Avenue. We are a few hundred yards down the road on the left, the large white farmhouse with

UPON ARRIVAL, please park in my lot, which is behind the inn. Walk inside the house and in th posted, and we will come to check you in.

Your confirmation number is: #85044. We have you confirmed for:

RESERVATION INFORMATION (#85044) - ERIN DOHERTY



203 4171184
Estimated Arrival - 3:00 PM

St. Sauveur

\$415.00

Thu Jun 24, 2021 2 Adults \$125.00